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Fred Stevens

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, LLC, *et al.*,

Debtors.

Chapter 11

Case No. 1212020 (MG)

(Jointly Administered)

**AMENDED REQUEST FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE  
EXPENSE CLAIM OF TATA AMERICA INTERNATIONAL CORPORATION**

Tata America International Corporation (“TCS”), by and through its undersigned counsel, hereby requests (the “Request”) allowance of its administrative expense claim for post-petition services rendered to the above-captioned debtors (the “Debtors”) pursuant to 503(b)(1) of title 11 of the United States Code (the “Bankruptcy Code”). TCS also requests payment of the Administrative Expense Claim pursuant to the Plan (defined below). In support of this Request, TCS respectfully represents as follows:

1. On May 14, 2012 (the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court.
2. The Debtors and TCS are parties to a Master Services Agreement (“MSA”) under which TCS provides certain IT services to the Debtors.

3. On December 11, 2013, this Court entered an *Order Confirming Second Amended Joint Chapter 11 Plan Proposed by Residential Capital, LLC, et al. and the Official Committee of Unsecured Creditors* [D.I. 6065] (the “Confirmation Order,” confirming the “Plan”).

4. As of December 17, 2013, the Debtors owed TCS \$16,341 (the “Administrative Expense Claim”) under the following two statements of work<sup>1</sup> for services rendered to the Debtors under the MSA postpetition, which amount remains unpaid:

ESTSOW 043	\$ 9,583
ESTSOW 002	\$ 6,758
Total:	\$16,341

5. The postpetition services TCS provided to the Debtors during these cases benefitted and preserved the Debtors’ estates. Accordingly, TCS is entitled to an allowed Administrative Expense Claim pursuant to section 503(b)(1) of the Bankruptcy Code, and requests payment of its Administrative Expense Claim pursuant to the Plan.

#### **RESERVATION OF RIGHTS**

6. TCS reserves its right to amend and/or supplement this Request. TCS files this Request without prejudice to any other claims TCS may hold against the Debtors.

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<sup>1</sup> The statements of work and corresponding invoices contain confidential information and will be provided to the Liquidating Trustee, U.S. Trustee and the Court upon request and entry of appropriate confidentiality protections.

**CONCLUSION**

WHEREFORE, TCS respectfully requests that its Administrative Expense Claim (i) be allowed in the amount of \$16,341 and (ii) be paid as an Allowed Administrative Expense Claim under the Plan.

Dated: New York, New York  
January 16, 2014

KLESTADT & WINTERS LLP

By: /s/ Fred Stevens  
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**CERTIFICATE OF SERVICE**

On January 16, 2014, I hereby certify that I: (i) electronically filed the foregoing *Amended Request for Allowance and Payment of Administrative Expense Claim* via this Court's CM/ECF system; and (ii) served such document on the following parties via first-class mail:

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